

1 withdraw that question and come back to it.

2 JUDGE SIPPEL: Your question's withdrawn? You may
3 proceed.

4 BY MR. GREENEBAUM:

5 Q What is your present employment?

6 A My present employment? I'm the vice-president and
7 treasurer of the Sinclair Broadcast Group, Inc.

8 MR. GREENEBAUM: Before I continue, Your Honor, I'd
9 move Exhibit 30 into evidence.

10 JUDGE SIPPEL: Thank you. Is there any objection?

11 MR. LEADER: Relevance.

12 JUDGE SIPPEL: For cross examination purposes, it
13 focused on a question that the witness was unable to answer as
14 a factual matter. I'll receive it -- overrule any objection
15 and receive it into evidence.

16 (Whereupon, the document referred
17 to as Scripps Howard Exhibit No. 30
18 was received into evidence.)

19 BY MR. GREENEBAUM:

20 Q What are your duties at the present time as the
21 vice-president and/or treasurer?

22 A At the present time, I'm at a hearing in Washington.

23 Q What are your duties in connection with Sinclair
24 Broadcast?

25 A My duties are to manage with my brothers the

1 Sinclair Broadcast Group which includes Fox affiliate stations
2 in Pittsburgh, Baltimore, and Columbus among these other
3 entities.

4 Q And as part of the group that oversees the
5 management of these three stations, what are your specific
6 duties on a day to day basis as vice-president and treasurer
7 of Sinclair?

8 A Specifically on a day to day, I couldn't tell you
9 what I'm going to do tomorrow. I don't have a formal agenda
10 on my daily routine. Everyday when we go to work, we'll
11 discuss whatever needs to be discussed. It may take half an
12 hour to get up to speed on -- for everybody to get up to speed
13 on what's going on, it may take two hours with very little
14 discussion or hardly any discussion at all, depending on the
15 day.

16 Q Let me refer you to Page Ten or your deposition and
17 maybe I'll just lead you through it and you tell me if this is
18 your recollection. Line One,

19 "Q And as part of the group that oversees
20 the management of these three stations,
21 what are your specific duties on a day
22 to day basis as vice-president and
23 treasurer of Sinclair?"

24 The answer on Line Five,

25 "A Specifically it varies from day to day.

1 We would have discussions or will in
2 the future also have discussions about
3 programming, personnel, hiring, and
4 firing thereof, finances, future of the
5 business, the future of our company,
6 and making decisions acting on those
7 parts of the business."

8 Do you recall that question and answer?

9 A Yes.

10 Q And that accurately reflects the situation?

11 A Yes.

12 Q And then I asked you,

13 "Q Is it a group process rather than
14 individuals having specific assignments
15 and responsibilities?

16 A It's a group. There are specific
17 assignments though, but --

18 Q Are there any specific assignments for
19 which you are responsible at Sinclair?

20 A Specifically? You can't say or you
21 wouldn't say that I have a job
22 description which delineates what I do
23 on a day to day basis.

24 Q And for the group to act, is it
25 necessary for everyone to be present?

1 A It depends on the issue.

2 Q So it's kind of ad hoc.

3 A Whatever that means. What does that mean?

4 Q Whatever is there --"

5 MR. LEADER: Whoever.

6 "Q Whoever is there might deal with the

7 matter as it arises?

8 A That's correct, depending on the severity

9 of it."

10 Are those -- do you recall being asked those

11 questions and giving those answers?

12 A Yes.

13 Q And they're true and accurate to the best of your

14 knowledge and recollection today?

15 A Yes.

16 Q Now, sir, on Page 47, Line Five, I asked you,

17 "Q Could you trace your career after you became

18 part of the executive committee with your

19 brothers following your year and a half as

20 program manager at WBFF and the Pittsburgh

21 situation as you described it?"

22 And your answer on Line 13,

23 "A It's been basically the same since that

24 day."

25 Is that correct?

1 A That's correct.

2 Q And on Page 50, Line Three,

3 "Q After you transitioned to the company
4 executive committee as you called it,
5 that was the management team approach
6 of you and your brothers?

7 A That's correct.

8 Q What were your duties, if any,
9 specifically at the onset of that
10 transition?

11 Q The same as they are now."

12 Is that -- was that correct then?

13 JUDGE SIPPEL: His answer was, "The same as they are
14 now."

15 BY MR. GREENEBAUM:

16 Q The same as they are now.

17 A That's correct.

18 Q Do you recall that?

19 A Yes.

20 Q And that's still accurate to the best of your
21 knowledge and recollection?

22 A Yes.

23 Q Now, on Page 50, I asked you a question, Line 21,

24 "Q Could you give us a snapshot of your
25 working day? What time do you start?

- 1 A It would be a blurry picture because
2 it's never the same.
- 3 Q Why don't you blur it for me as best
4 you can? And then I'll try to clarify.
- 5 A The typical day is atypical. There are
6 times when I'll go in and we'll be
7 sitting there and there'll be just a
8 myriad of things to talk about, things
9 to go over, things to plan for, things
10 to discuss. Other times there won't be
11 anything at all for a day. It will just
12 be business as usual.
- 13 Q Do you have regular work hours?
- 14 A Um-hmm.
- 15 Q What are they?
- 16 A 9:00 to 5:00."
- 17 Do you recall giving me those answers in connection
18 with your typical work day?
- 19 A Yes.
- 20 Q And do you recall then on Line 15, I asked you,
21 "Q Do your brothers who coordinate with you
22 on this management approach have regular
23 work hours?
- 24 A On the what approach?
- 25 Q Who coordinate with you on this management

1 team approach have regular work hours as
2 well?

3 A Um-hmm.

4 Q What are they?

5 A Same as mine."

6 Do you recall that answer and question?

7 A Yes.

8 Q And then on Line 52 --

9 JUDGE SIPPEL: Page 52?

10 MR. GREENEBAUM: Page 52. I'm sorry, Your Honor.

11 BY MR. GREENEBAUM:

12 Q Line One,

13 "Q So everybody has 9:00 to 5:00.

14 A Or whatever it takes to get the job done,
15 If we have to stay later or come earlier
16 or leave later or whatever."

17 Do you recall that question and answer?

18 A Yes.

19 Q So you're essentially working 9:00 to 5:00, but to
20 the extent it's required, you all work later and do whatever
21 has to be done to get the job done. Is that correct?

22 A That's correct.

23 Q And do you work a full day?

24 A If need be.

25 Q Well, to what extent -- how many days a week at

1 Sinclair over the last year or any other period that you can
2 recall did you work a full day every week?

3 A A full day every week? How many weeks over the past
4 year?

5 Q I'm just trying to get a feel without being too
6 clever of what your work day, what your work obligations or
7 responsibilities are.

8 A Well, like I said, it's not -- technically it's 9:00
9 to 5:00, but there's no -- we're not like a secretary who has
10 to be there 9:00 to 5:00. We're a management team that
11 manages stations that have professional and general managers
12 already in place. Basically if we weren't there at all for a
13 month, the tasks at those stations would still get done
14 because they are managed by other people.

15 Q Those general managers are employees, are they not?

16 A That's correct.

17 Q And you all supervise them, right?

18 A That's correct.

19 Q And there are certain decisions -- in fact, there
20 are a lot of decisions they can't make without guidance and
21 supervision from what I would call the home office where you
22 are. Is that right?

23 A That's correct.

24 Q And you all have got a lot of stations and a lot of
25 businesses that you're running. Isn't that correct?

1 MR. LEADER: Well, I'm going to object. The record,
2 once again, speaks for itself, not characterizing it as a lot.

3 JUDGE SIPPEL: Well, I'll sustain that or you can
4 rephrase the question. You certainly have a number of
5 stations, a number of properties that you have to supervise.

6 BY MR. GREENEBAUM:

7 Q You all are supervising and coordinating a number of
8 stations and other properties as reflected on the chart that
9 we have in evidence in this matter, do we not -- don't you?

10 A Yes.

11 Q And that requires some continuous time and
12 attention, does it not?

13 A Sometimes.

14 Q Well, certainly if a station needed to borrow money,
15 the general manager couldn't do that, could he?

16 A Stations wouldn't borrow money individually.

17 Q Well, give me examples of what it is that you would
18 think a general manager would not have the authority to do
19 without calling your or one of --

20 MR. LEADER: Objection, Your Honor. I mean, if he's
21 got a question -- he's asking the witness to ask a question.

22 JUDGE SIPPEL: I'll sustain it.

23 MR. LEADER: If he has a specific task in mind that
24 requires time, Mr. Greenebaum ought to be able to articulate
25 it and the witness will answer it.

1 JUDGE SIPPEL: I've sustained the objection.

2 BY MR. GREENEBAUM:

3 Q Does Sinclair do its tax returns on a consolidated
4 basis?

5 A Does Sinclair do -- yes.

6 Q And that requires input and decisions from your and
7 your brothers, does it not?

8 A Well, we have a big accounting firm that handles the
9 accounting in terms of the tax returns plus our in-house
10 accounting helps them to provide information.

11 Q Now, when you go in, in the morning, do you expect
12 to see your brothers on a regular basis at work just as you
13 are working?

14 A Yes.

15 Q So generally everybody is working regularly.

16 A Yes.

17 Q And there's plenty for you to do.

18 A Plenty for me to do? Define plenty.

19 Q Do you keep occupied or -- I mean, or you feel that
20 you've got time to kill or nothing to do on a daily basis?

21 A A lot of times, there's time to kill and I'll read
22 trade magazines or get up to speed or just, you know, talk to
23 the general managers or walk around the facility right there,
24 just to interface with people.

25 Q Isn't that part of being an owner?

1 A Isn't what part of being an owner?

2 Q Talking to the general managers, reading the trade
3 magazines, and walking around talking to people?

4 A I don't know whether it is or it isn't.

5 Q You don't go to work and just look at the walls, do
6 you?

7 A Look at the walls?

8 Q Yeah.

9 A Of course not.

10 Q And Sinclair is planning to add two more stations?

11 A Hopefully.

12 Q And you're presently operating Chesapeake, which is
13 Channel 45 in Baltimore, WTTE, Channel 28 in Columbus, and
14 WPGH, Channel 53 in Pittsburgh. Is that correct?

15 A That's correct.

16 Q And Pittsburgh is also programming another station
17 as well?

18 MR. LEADER: I'm going to object to the form of the
19 question.

20 JUDGE SIPPEL: It's sustained. Just rephrase the
21 question.

22 BY MR. GREENEBAUM:

23 Q And the two stations that you propose to add to
24 Sinclair are WCGV, which is Channel 24, Milwaukee, and WTTO,
25 which is Channel 21 in Birmingham. Is that correct?

1 A That's correct.

2 Q Do each of the stations have a comptroller?

3 A No, each of the stations has a business manager and
4 at least one or two assistants.

5 Q But there is a comptroller at Sinclair who, I guess,
6 checks on the financial situation at each station?

7 A There is a comptroller for Sinclair, yes.

8 Q And he reports to you and your brothers.

9 A That's correct.

10 Q And then there's a general manager at each of the
11 Sinclair stations. Is that correct?

12 A Yes. That's correct.

13 Q And he reports to you and your brothers as well. Is
14 that correct?

15 A That's correct.

16 Q And is Chesapeake providing broadcast programming
17 for station WPTT in Pittsburgh?

18 MR. LEADER: I'm going to object to the form of the
19 question.

20 JUDGE SIPPEL: Well, it's a pretty -- it seems like
21 a pretty straight-forward question.

22 MR. LEADER: Well, it's not -- it isn't. He's got
23 the party wrong. He's got the parties wrong.

24 MR. GREENEBAUM: Well, I'd substitute WPGH for
25 Chesapeake as providing programming for station WPTT.

1 JUDGE SIPPEL: Is that better?

2 MR. LEADER: That's a better question.

3 JUDGE SIPPEL: All right. I'll sustain the
4 objection since it's been clarified. Can you answer the
5 question?

6 MR. R. SMITH: Yes.

7 MR. GREENEBAUM: If your Honor would indulge me one
8 moment.

9 JUDGE SIPPEL: Let's go off the record for a minute.

10 (Off the record.)

11 (On the record.)

12 BY MR. GREENEBAUM:

13 Q Do you anticipate that WCGV will program WVTW as
14 well?

15 MR. LEADER: What do you mean "anticipate"?

16 MR. R. SMITH: Do I anticipate that --

17 MR. LEADER: I'm going to object because I'm not --
18 I don't think that's a correct characterization of the
19 contractual relationship between the parties.

20 JUDGE SIPPEL: Well, I'm going to permit the
21 question to go forward with cross examination. Go ahead, Mr.
22 Greenebaum.

23 MR. R. SMITH: Could you repeat it, please?

24 BY MR. GREENEBAUM:

25 Q Do you anticipate that WCGV will program WVTW?

1 A I believe that's the way the applications were
2 presented to the Commission.

3 Q As part of the family's broadcast holdings, you also
4 have a 25 percent interest in Channel 63 in Bloomington, do
5 you not, sir?

6 A Yes.

7 Q And are you an officer of that station as well?

8 A Yes.

9 Q What is your office?

10 A I think it's treasurer in that one, also.

11 Q And how about Bay Television for Channel 38 in St.
12 Petersburg or Tampa, Florida?

13 A Treasurer, also.

14 Q And as treasurer, what are your duties in connection
15 with either or both of those stations?

16 A My duties as treasurer --

17 Q Yes, sir.

18 A -- are the same as they are with any of the other
19 entities.

20 Q Well, what do you do as treasurer in connection with
21 Bay Television?

22 A Very little. The finances -- financial side, in
23 terms of record keeping, et cetera, that some people might
24 think a treasurer would normally do are handled by, once
25 again, the business managers at those stations and --

1 Q But do those people -- I'm sorry. I did not mean to
2 cut you off.

3 A No, go ahead.

4 Q Do those people who handle the finance of the
5 stations report to you as the treasurer?

6 A Do they report to me as the treasurer?

7 Q Yes, sir.

8 A They report to me as me. They don't look at me as,
9 you know, a calculator walking around waiting for numbers on
10 answers -- the answers on numbers. They just -- you know, if
11 I'm an owner of one of these businesses and I have a question
12 of the person that's handling the finances for that company,
13 you know, what are the outstanding days on collections and
14 they'll get the information for me. But as to whether I'm a
15 treasurer or not, it doesn't mean anything in terms of --

16 Q So what you do is geared to what you want to do or
17 what your interest is as opposed to what your title is.

18 A Yeah. That's a better way to describe it, I'd say.

19 Q And that's the same for all of your brothers.

20 A Titles don't mean anything to us.

21 Q So that you, Dave, Robert, and Duncan just kind of
22 interact and do what you think is appropriate to keep the
23 family business moving forward.

24 A That's correct.

25 Q You can deal with anybody anyway you want.

1 A That's correct.

2 Q Now, how much time do you spend in an average week
3 say dealing with Bay Television or Channel 63 as you deem
4 appropriate or want to spend?

5 MR. LEADER: May I object, please? He ought to ask
6 the witness, first about -- I don't mean to interrupt, but
7 first about how much time he spends at each station. This is
8 a compound question. He's asked him in one question how much
9 time he spends at two stations.

10 MR. GREENEBAUM: I'm trying to move it along, Your
11 Honor, because I think it's obvious what my difficulty is here
12 and I don't -- I'm doing the best I can.

13 JUDGE SIPPEL: I think that your way, if things were
14 more compart-- had been testified to or the evidence was more
15 compartmentalized, I would -- I would honor your suggestion,
16 Mr. Leader. But we -- it's similar to the situation that we
17 had when Scripps Howard was being cross examined. We had this
18 fluidity kind of testimony which is -- I think it's best
19 handled a little bit differently. So I'm going to permit Mr.
20 Greenebaum to approach it his way. I'll overrule the
21 objection. Go ahead, Mr. Greenebaum.

22 MR. GREENEBAUM: Could you answer the question,
23 please?

24 MR. R. SMITH: Can you repeat it, please?

25 MR. GREENEBAUM: I really want to ask the same

1 question. Could you check it, please, Ms. Reporter?

2 MS. SCHMELTZER: It was how much time do you spend
3 at Bay Television or Channel 63? But that doesn't really --

4 MR. LEADER: I don't know how you can answer that
5 question.

6 MR. GREENEBAUM: Either or both is what I believe
7 the question was.

8 MR. LEADER: No. Let's listen to it.

9 (Whereupon, a portion of the record was played
10 back.)

11 JUDGE SIPPEL: I've already ruled. If the witness
12 can answer that question -- can you answer that question?

13 MR. R. SMITH: Well, you asked as I deem appropriate
14 or would like to spend. Is that not two questions?

15 MR. GREENEBAUM: Let me back up.

16 MR. R. SMITH: I mean, I could give it a shot. It's
17 not that big of a deal.

18 JUDGE SIPPEL: Well, we'll rephrase the question.
19 Go ahead, Mr. Greenebaum.

20 BY MR. GREENEBAUM:

21 Q As I understand it, you deal with these two
22 stations, Channel 63 and Bay Television, as you deem
23 appropriate based on whatever's happening at the time. Is
24 that correct?

25 A That's correct.

1 Q Now, I'm trying to find out if you could tell me --
2 and I'll limit it, in order to make Mr. Leader happy, this
3 time to Channel 63. Can you tell me how much time you spend
4 during the course of an average week on Channel 63 matters?

5 A I'd say maybe a couple of hours a week.

6 Q And how about anything relating to Channel 63,
7 directly or indirectly related to it, even though it may not
8 be exactly Channel Three (sic) stuff.

9 A You completely lost me on that one. I didn't
10 understand that question.

11 Q How about Bay Television? How much time do you
12 spend on Bay Television matters during the course of --

13 A My answer was accumulative.

14 Q So I broke it down to make Mr. Leader happy and you
15 combined the answer.

16 A A couple of hours a week combined.

17 Q Both of them, okay. Can you give us any example of
18 when you last worked on a matter involving either of those
19 stations?

20 A Channel 63, a couple of weeks ago. Every week,
21 we'll get a report from the manager that highlights what's
22 going on, what we need to be aware of, and there was a
23 question about cable coverage on one of the cable systems in
24 Indianapolis that was giving us trouble and I interfaced with
25 her and to my recollection, she called counsel and got

1 direction from him on a letter that needed to be written to
2 that cable company because we felt we had a legitimate, legal
3 right to be on that system and they didn't want us on there
4 and that was that.

5 Q This was part of a weekly report?

6 A She had sent down something in her weekly report
7 under the cable heading that said we're having trouble with
8 this cable company. So I called her up and started talking to
9 her about it and one thing led to another. She was going to
10 write a letter telling them. I told her let me review the
11 letter before she wrote it -- before she sent it out which I
12 did and she got corporate counsel -- I'm pretty sure she
13 called Martin on whether or not we actually did have a
14 legitimate right to tell them, "We're on that cable system and
15 you can't knock us off."

16 Q And don't tell me -- I'm not interested at all what
17 you or Martin -- I'm presuming you mean Mr. Leader -- said.
18 But did you talk to Mr. Leader about that problem after you
19 got the letter?

20 A No.

21 Q Did anybody talk to Mr. Leader about it so far as
22 you know?

23 A The lady in charge of the station out there, I
24 presume, actually called Counselor Leader.

25 Q And how did you learn what decision, if any, had

1 | been made?

2 | A Because she sent me a copy of the letter after I
3 | reviewed it.

4 | Q Now, did she deal only with you or did she send it
5 | to Sinclair and you were the one who got it?

6 | A We all passed it around.

7 | Q So everybody spent time on it.

8 | A I got it -- I think that day I got it and made my
9 | comments on what conversation I had had with the lady that
10 | runs the operation up there and then I passed it on to the
11 | next guy and then he -- if he wants to act on it or ask me
12 | questions about what I did with Barbara, the lady that's up
13 | there, then he can do that or he can just pass it down to the
14 | next guy.

15 | Q Who did you pass it to? Do you recall?

16 | A No, I don't remember. Sometimes I go right,
17 | sometimes I go left.

18 | JUDGE SIPPEL: How do you know in a situation like
19 | that that two aren't independently inquiring of the same thing
20 | at the same time?

21 | MR. R. SMITH: Well, because we have a stamp that
22 | has all our initials on it and if you have it and your initial
23 | hasn't been stamped, that means you haven't done anything with
24 | it, so you check it off. Once you've looked at it, reviewed
25 | it, or studied it to the best of your -- to the extent that

1 you deem appropriate, you check it off and hand it to the next
2 guy.

3 JUDGE SIPPEL: There's a routing slip there.

4 MR. R. SMITH: It's not a slip, it's a stamp that
5 you just check -- your initials are on the stamp and you check
6 it off and pass it down to the next guy.

7 JUDGE SIPPEL: All right. And who gets it first?
8 Does somebody get it first?

9 MR. R. SMITH: That's hard to say. There's no -- I
10 mean, usually it just comes "Attention: the Executive
11 Committee" which is what our titles are.

12 JUDGE SIPPEL: Is there somebody that --

13 MR. R. SMITH: And the secretary will -- I didn't
14 mean to interrupt.

15 JUDGE SIPPEL: Go ahead.

16 MR. R. SMITH: Our secretary, whose title is office
17 manager, she'll pass it around. There's no -- you know, for
18 example, two of us may be in the office at that particular
19 incident. Two other guys might be walking around the building
20 or talking to people in news or upstairs and she'll just hand
21 it to one of the two guys that's sitting there and we'll start
22 talking about it. That's just a general example.

23 JUDGE SIPPEL: Does the -- you said that the person
24 at -- was this Channel 63 -- there was a woman at 63 that
25 called about the problem? Was that where you had the problem

1 with the cable?

2 MR. R. SMITH: I don't think she called. I think it
3 was in her weekly report.

4 JUDGE SIPPEL: It was in her weekly report and you
5 called her. Now, did she call -- is that a practice to have
6 somebody from the stations call counsel directly without going
7 through somebody in Sinclair's office?

8 MR. R. SMITH: Sometimes they will, yeah. Depending
9 on the issue, they'll call them up and they'll -- sometimes
10 before they'll call us to say, "I've spoken to Martin,"
11 especially on this cable stuff that's been going back and
12 forth. "I've spoken to Martin. Here's what he thinks I
13 should write in the letter. I wanted to run it by you first."

14 JUDGE SIPPEL: All right. That's all I have.

15 MR. GREENEBAUM: I can't resist. Who is the office
16 manager?

17 MR. LEADER: I can't resist, either. Does it
18 matter?

19 MR. R. SMITH: For us?

20 MR. GREENEBAUM: Yeah.

21 MR. LEADER: Do we care?

22 MR. R. SMITH: Her name's Lonnie Reynolds.

23 MR. GREENEBAUM: When this routing stamp goes
24 around, whose initials are on it?

25 MR. LEADER: I'm going to object. The routing stamp

1 doesn't go around. Do you mean something that's stamped?

2 MR. GREENEBAUM: Yes. You're right.

3 BY MR. GREENEBAUM:

4 Q When the routing stamp is placed on the document
5 before it's circulated, whose initials appear on the stamped
6 version that appears on the paper?

7 A Myself, my three brothers. My father's initials are
8 still on there because we never got a new stamp after he died.
9 And the comptroller, David Amy.

10 Q And does that mean that everybody's expected to see
11 every piece of paper that's stamped with that routing slip or
12 whatever you want to call it?

13 A It doesn't mean that they're definitely going to get
14 it. Depending on the issue, two or three guys may see it and
15 then give it to Lonnie and write "file" on it and put it in
16 the file. If it's something that, you know, one of us thinks
17 we should all should see, then it'll just keep going back and
18 forth until everyone's looked at it and then the last person
19 will give it to her to file.

20 Q But if no one decides that everyone should see it
21 and you're the first person who sees it, when you mark "file,"
22 it goes in the file without anybody seeing it. Is that
23 correct?

24 A I can't remember the time I'm the only one that's
25 seen something and written "file" on it.

1 Q Well, I'm only trying to figure out the procedure.
2 I'm trying to find out if there's a procedure, if everybody
3 sees everything, or everybody sees everything if everybody
4 else wants them to see it, and if the stamp has any purpose at
5 all.

6 A I think you lost me on your question, but the object
7 is for everyone to see it and do with it what they will.

8 Q So anything -- if anything came -- if something came
9 to you and it had been seen by Fred and Robert and you, sir --

10 A I'm Robert.

11 Q Or you and Dave and Fred, and Duncan hadn't see it,
12 and they wanted -- the others wanted to act, would you insist
13 that Duncan saw it before you acted or would you file it --

14 A It depends on the issue and there's no delineation
15 over what issues get three votes or what gets four.

16 Q Are there any written guidelines or procedures that
17 apply to this in your organization?

18 A Brotherhood. That's all I can tell you. We all
19 know a lot about how each -- the other guy thinks and what
20 this guy would maybe want to see versus this guy and whether I
21 should give it to him first or this guy first. I mean, you've
22 just got to be there.

23 Q And while you're sitting there at Sinclair, you
24 might be working on the business of any entity that's on this
25 Exhibit 27. Is that correct?

1 A That's correct.

2 Q And all the businesses are located at 2000 West 41st
3 Street. Is that correct?

4 A That's corporate headquarters.

5 Q And there's one telephone number for all of them.

6 A Yeah.

7 Q And you have one phone on your desk.

8 A That's all I can handle.

9 Q And what's the name on the door or the building or
10 whatever?

11 A Well, there's -- well, the main entrance is FOX 45,
12 WBFF TV, and then when you get to our entrance, it's Sinclair
13 Broadcast Group, and several of these companies are delineated
14 there, too.

15 Q And does the secretary have stationary for all these
16 various entities at her desk?

17 A Does she have stationary?

18 Q Yeah.

19 A Yes.

20 Q And do you -- if you were going to write something,
21 do something for Keyser Communications, does Keyser
22 Communications have its own stationary or would you write it
23 on Sinclair?

24 A I don't know what I would do. I don't know that I
25 would -- I don't even know if there is Keyser Communications